

FILED

MAR 06 2024

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE

Clerk, U. S. District Court
Eastern District of Tennessee
At Knoxville

UNITED STATES OF AMERICA,)
)
Plaintiff,) NO. 3:23-CR-119
)
v.) JUDGES CRYTZER / MCCOOK
)
BRANDON RAY REECE,)
VITINA NICOLE JARVIS, and)
COURTNEY LEIGH REECE,)
)
Defendants.)

FIRST SUPERSEDING INDICTMENT

COUNT ONE

The Grand Jury charges that, on or about November 28, 2023, in the Eastern District of Tennessee, the defendant, BRANDON RAY REECE, knowing he was previously convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess a firearm, that is, a Ruger EC9S 9mm semi-automatic pistol, and ammunition, and the firearm and ammunition were transported in interstate or foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWO

The Grand Jury further charges that, on diverse dates between on or about July 31, 2023, through on or about November 28, 2023, the exact dates being unknown to the Grand Jury, in the Eastern District of Tennessee, the defendant, BRANDON RAY REECE, knowing he was previously convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess a firearm, that is, a Ruger SR1911 .45 caliber semi-automatic pistol, and the

firearm was transported in interstate or foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT THREE

The Grand Jury further charges that, on diverse dates between on or about July 6, 2023, and on or about July 14, 2023, the exact dates being unknown to the Grand Jury, in the Eastern District of Tennessee, the defendants, BRANDON RAY REECE and COURTNEY LEIGH REECE, did knowingly, intentionally, and without authority combine, conspire, confederate, and agree with one another to purchase a firearm, that is, a Ruger SR1911 .45 caliber semi-automatic pistol, in or otherwise affecting interstate or foreign commerce, for, on behalf of, and at the request and demand of BRANDON RAY REECE, knowing and having reasonable cause to believe that BRANDON RAY REECE had previously been convicted in any court of a crime punishable by imprisonment for a term exceeding one year, in violation of Title 18, United States Code, Section 932(b)(1).

COUNT FOUR

The Grand Jury further charges that, on or about July 14, 2023, in the Eastern District of Tennessee, the defendant, COURTNEY LEIGH REECE, did knowingly purchase a firearm, that is, a Ruger SR1911 .45 caliber semi-automatic pistol, in or otherwise affecting interstate or foreign commerce, for, on behalf of, and at the request or demand of Brandon Reece, knowing and having reasonable cause to believe that Brandon Ray Reece had previously been convicted in any court of a crime punishable by imprisonment for a term exceeding one year, in violation of Title 18, United States Code, Section 932(b)(1).

COUNT FIVE

The Grand Jury further charges that, on diverse dates between on or about July 7, 2023, and on or about November 28, 2023, the exact dates being unknown to the Grand Jury, in the Eastern District of Tennessee, the defendants, BRANDON RAY REECE and COURTNEY LEIGH REECE, did knowingly, intentionally, and without authority combine, conspire, confederate, and agree with one another to transport, transfer, cause to be transported, and otherwise dispose of a firearm, that is, a Ruger SR1911 .45 caliber semi-automatic pistol, to BRANDON RAY REECE, in and otherwise affecting commerce, knowing and having reasonable cause to believe that the use, carrying, and possession of the firearm by BRANDON REECE would constitute a felony (as defined in Title 18 United States Code, Section 932(a)(3)), all in violation of Title 18, United States Code, Section 933(a)(1), (a)(3), and (b).

COUNT SIX

The Grand Jury further charges that, on or about July 7, 2023, in the Eastern District of Tennessee, the defendant, COURTNEY LEIGH REECE, in connection with the acquisition of a firearm from Crossroads Firearms, located at or near 5703 North Broadway, Knoxville, Tennessee 37918, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did knowingly make a false and fictitious written statement in executing a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, Firearms Transaction Record, to the effect that she was the actual buyer of the firearm indicated on the Form 4473, when in fact, as the defendant then knew, she was not the actual buyer of the firearm, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT SEVEN

The Grand Jury further charges that, on diverse dates between on or about July 22, 2023, and on or about July 27, 2023, the exact dates being unknown to the Grand Jury, in the Eastern District of Tennessee and elsewhere, the defendants, BRANDON RAY REECE and VITINA NICOLE JARVIS, did knowingly, intentionally, and without authority combine, conspire, confederate, and agree with one another to purchase a firearm, that is, a Ruger EC9S 9mm semi-automatic pistol, in and otherwise affecting interstate or foreign commerce, for, on behalf of, and at the request and demand of BRANDON RAY REECE, knowing and having reasonable cause to believe that BRANDON RAY REECE had previously been convicted in any court of a crime punishable by imprisonment for a term exceeding one year, in violation of Title 18, United States Code, Section 932(b)(1).

COUNT EIGHT

The Grand Jury further charges that, on diverse dates between on or about July 22, 2023, and on or about November 28, 2023 the exact dates being unknown to the Grand Jury, in the Eastern District of Tennessee and elsewhere, the defendants, BRANDON RAY REECE and VITINA NICOLE JARVIS, did knowingly, intentionally, and without authority combine, conspire, confederate, and agree with one another to transport, transfer, cause to be transported, and otherwise dispose of a firearm, that is, a Ruger EC9S 9mm semi-automatic pistol, to BRANDON RAY REECE, in and otherwise affecting commerce, knowing and having reasonable cause to believe that the use, carrying, and possession of the firearm by BRANDON RAY REECE would constitute a felony (as defined in Title 18 United States Code, Section 932(a)(3)), all in violation of Title 18, United States Code, Section 933(a)(1), (a)(3), and (b).

COUNT NINE

The Grand Jury further charges that, on diverse dates between on or about July 31, 2023, and on or about November 28, 2023, the exact dates being unknown to the Grand Jury, in the Eastern District of Tennessee, the defendant, VITINA NICOLE JARVIS, did attempt to transfer and otherwise dispose of a firearm, that is, a Ruger EC9S 9mm semi-automatic pistol, to Brandon Ray Reece, in and otherwise affecting commerce, knowing and having reasonable cause to believe that the use, carrying, and possession of the firearm by Brandon Ray Reece would constitute a felony (as defined in Title 18 United States Code, Section 932(a)(3)), all in violation of Title 18, United States Code, Section 933(a)(1), (a)(3), and (b).

FORFEITURE ALLEGATIONS

The allegations contained in Counts One through Nine of this Indictment are hereby re-alleged and incorporated herein by reference to allege forfeiture under Title 18, United States Code, Section 924(d)(1), Title 18, United States Code, Section 934(a)(1), and Title 28, United States Code, Section 2461(c).

Upon conviction of Title 18, United States Code, Sections 922(g)(1), and/or 922(a)(6) and 924(a)(2) in Counts One, Two, and Six the defendants, BRANDON RAY REECE and COURTNEY LEIGH REECE, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c) any firearm or ammunition involved in or used in the commission of the offense.

Upon conviction of Title 18 United States Code, Section 932(b)(1) and/or 933(a)(1), (a)(3) and (b) in Counts Three, Four, Five, Seven, Eight and Nine the defendants, BRANDON RAY REECE, COURTNEY LEIGH REECE and VINTA NICOLE JARVIS, shall forfeit to the United

States under Title 18 Section 934(a)(1) any firearm or ammunition involved in or used in the commission of the offense.

The properties to be forfeited include, but are not limited, the following:

- a. Ruger SR1911 .45 caliber semi-automatic pistol
- b. Ruger EC9S 9mm semi-automatic pistol
- c. Ammunition.

If, because of any act or omission by the defendant, the described property:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

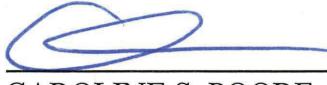
then the United States of America shall be entitled to forfeiture of substitute property under Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL:

SIGNATURE REDACTED

GRAND JURY FOREPERSON

FRANCIS M. HAMILTON III
UNITED STATES ATTORNEY



CAROLINE S. POORE
Assistant United States Attorney